



301 Commerce Street, Suite 500
Fort Worth, TX 76102

Long B. Nguyen
Director, Process Safety & Environmental Programs

February 17, 2022

Director, Air Enforcement Division
U.S. Environmental Protection Agency
MC 2242A
1200 Pennsylvania Ave. NW Washington,
D.C. 20460

Director
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency, Region 6
1201 Elm Street
Dallas, TX 75270

Director of Litigation
Litigation Division
MC-175
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Division Chief
Environmental Protection Division
MC-066
Office of the Attorney General of Texas
P.O. Box 12548
Austin, TX 78711-2548

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611

**Re: Malfunction Event Notice
Tokai Carbon CB Borger Plant**

Dear Sir/Madame:

Per Provision 54 of the Consent Decree, Tokai Carbon CB hereby provides notice that the Borger Plant Wet Gas Acid (“WSA”) scrubber had elevated SO₂ emissions relative to the 7-day SO₂ limit of 120 ppmvd@ 0% O₂. The CEMS data show that the elevated SO₂ emissions, relative to the 7-day emission limit, lasted from January 24 through February 8, 2022.

Plant personnel had to shut down Boiler 2 on January 23rd, 2022 due to a boiler tube leak. Boiler 1 continued its operation and all of the flue gas was routed to the WSA scrubber to be controlled. When this change in the process occurred, plant personnel noticed that the SO₂ emissions became elevated. Plant personnel started the trouble-shooting process to determine the cause of this increase in the SO₂ emissions. Plant personnel was not able to identify any obvious causes because the WSA scrubber process parameters remained the

same, with the exception that only flue gas from Boiler 1 was being routed to the WSA scrubber. Plant personnel continued the trouble shooting process until the tube leaks from Boiler 2 were fixed. Boiler 2 was brought back online on February 2 and the flue gas from this boiler was then routed to the WSA scrubber. After this, the SO₂ emissions dropped below the 120 ppmvd limit. We are in the process of our investigation to determine the root cause of the elevated SO₂ emissions.

An affirmation defense will be asserted for this malfunction event in the next semi-annual compliance report per Provision 77 of the Consent Decree. Please let me know if you need additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Long B. Nguyen', with a stylized flourish at the end.

Long B. Nguyen